
420 Lexington Avenue • Suite 2525 • New York, New York 10170
T: 212.792-0048 • E: Jason@levinepstein.com

May 28, 2020

Via Electronic Filing

The Honorable District Judge George B. Daniels
U.S. District Court Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Antolini v. McCloskey et al*
Case No.: 1:19-cv-09038-GBD

Dear Honorable Judge Daniels:

This law firm represents Defendants Dimur Enterprises Inc., Amy McCloskey and Theresa Laurent (collectively, the “**Defendants**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules II(A) and IV(A), this letter respectfully serves to respond to the May 25, 2020 letter [Dckt. No. 34] (the “**Pre-Motion Letter**”) of Plaintiff Dino Antolini (the “**Plaintiff**”) seeking a pre-motion information conference for Plaintiff’s anticipated motion to compel.

As stated in email communications to Plaintiff’s counsel, including the undersigned’s emails dated December 6, 2019 and May 7, 2020, Plaintiff’s discovery requests are premature pursuant to Fed.R.Civ.Pro. 26(d)(2)(B). Specifically, the initial case conference – currently scheduled for September 24, 2020 at 9:30 a.m. – has not taken place.

Separately, on May 5, 2020, Your Honor So-Ordered a deadline of October 1, 2020 to respond to any document requests or discovery demands. [See Dckt. No. 33].

Lastly, Plaintiff’s counsel has failed to serve Defendants with Plaintiff’s Rule 26(a) Initial Disclosures. This letter respectfully serves to schedule a pre-motion conference in anticipation of Defendant’s motion to compel Plaintiff to do so.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi
420 Lexington Avenue, Suite 2525
New York, NY 10170
Tel.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Defendants

Cc: All Parties via ECF